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14 *Attorneys for Plaintiff, Justin Cody Harper*

15
16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18

19 JUSTIN CODY HARPER,

20 Plaintiff,

21 vs.

22 CITY OF REDLANDS, REDLANDS
23 POLICE DEPARTMENT, POLICE
OFFICER KOAHU, AND DOES 1-
24 10, INCLUSIVE,

25 Defendants.
26
27

Case No. 5:23-cv-00695-SSS-DTB

Assigned to:

Hon. District Judge Sunshine S. Sykes
Hon. Mag. Judge David T. Bristow

**JOINT STIPULATION AND
REQUEST FOR AN EXTENDED
BREIFING SCHEDULE AND
CONTINUATION OF THE
HEARING ON DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT**

1 COME NOW Plaintiff Justin Harper and Defendants City of Redlands and Nicholas
2 Koahu and hereby stipulate and request as follows:

- 3 1. On December 12, 2024, counsel for Defendants and counsel for Plaintiff met
4 and conferred by Zoom regarding Defendants' anticipated Motion for
5 Summary Judgment. During the meet and confer, counsel discussed the
6 substantive issues to be addressed in the Parties' briefing on the Motion for
7 Summary Judgment. Counsel also discussed the briefing schedule pertaining
8 to the Motion for Summary Judgment and their interest in modifying the
9 briefing schedule to accommodate holiday travel and prescheduled vacation
10 plans.
- 11 2. Currently, Defendants' Motion for Summary Judgment is to be filed no later
12 than December 20, 2024, Plaintiff's opposition to Defendants' Motion for
13 Summary Judgment is to be filed no later than January 3, 2025, and
14 Defendants' reply brief is to be filed no later than January 10, 2025.
- 15 3. The Parties submit that GOOD CAUSE exists to modify this briefing
16 schedule, as follows:
 - 17 a. Plaintiff's 14-day period to oppose Defendants' Motion for Summary
18 Judgment includes the following federal holidays and/or office
19 closures: December 24, 2024; December 25, 2024, January 1, 2025.
20 This 14-day period also includes four weekend days.
 - 21 b. Plaintiff's lead counsel, Dale K. Galipo, will be out of town visiting
22 family for the holidays during a significant portion of Plaintiff's 14-day
23 period to oppose Defendants' Motion for Summary Judgment.
 - 24 c. Defendants' lead counsel, Scott Wm. Davenport, will be out of the
25 office starting January 10, 2025, and returning January 21, 2025.
 - 26 d. This Request shall not impact the trial date in this case.

4. THEREFORE, the Parties jointly request that this Court modify the briefing schedule as follows:

Event	Current Date	Proposed Date
Last Day to File Motion for Summary Judgment	12/20/2024	No change
Last Day to Oppose the Motion for Summary Judgment	1/03/2025	1/17/2025
Last Day to Reply	01/10/2025	1/31/2025
Hearing on Motion for Summary Judgment	02/07/2025	2/28/2025

IT IS SO STIPULATED.

DATED: December 13, 2024

LAW OFFICES OF DALE K. GALIPO

By: /s/ Dale K. Galipo

Dale K. Galipo
Renee V. Masongsong
Attorney for Plaintiff

DATED: December 13, 2024

JONES MAYER LAW

By: /s/ Scott Wm. Davenport

Scott Wm. Davenport
Attorney for Defendants